

Permitting of discharge associated with Ash Pond C: Chronological history

- 1991 -** VPDES permit reissued with effective date May 8. Permit and Fact Sheet do not contain any reference to Ponds A, B, & C. Stormwater requirements not included in individual permit.
- 1996 -** VPDES Storm Water General Permit (Permit No. VAR330109) issued with date of coverage March 12, 1996. Permit contained Part I. pages for "coal" and "oil" handling sites at steam electric generating facilities (other than coal pile runoff), with associated effluent monitoring requirements. The permit also contained a requirement to develop a storm water pollution prevention plan.
- 1996 -** Storm Water Pollution Prevention Plan dated March 14, 1996 contains the following description of storm water Outfall S104. The plan clearly identifies the location of the old ponds but concludes no potential for contaminants due to nature of drainage area that time.

VA# S104

**Outfall and
Drop Inlets
(pipes) and
[manholes]:**

(103)
VA# S104 <
(102)

**Outfall
Location:**

Latitude 38° 32' 34", Longitude 77° 16' 45"

Description:

Outfall VA# S104 is a 30" concrete pipe which is integral to an inactive decant structure that previously served Ash Ponds A, B, and C. The drainage area associated with VA# S104 is approximately 43.8 acres with 50% cleared, 10% highway, 25% medium woods, and 15% brush. Three drainage areas contribute runoff to this outfall:

1. A small drainage area (two acres) located on the northwest side of the intersection of Possum Point Road and Cockpit Point Road contributes runoff to VA# S104 via pipe #102. This area consists of 5% cleared, 30% highway, and 65% medium woods.
2. Approximately 16.9 acres just northwest of area 1 above, and bounded to the southwest by Possum Point Road, contributes runoff to VA# S104 via pipe #103. This area contains approximately 5% cleared, 5% highway, 35% brush, and 55% medium woods.
3. Approximately 25 acres (43.8 acres total minus 16.9 acres #103 and 2 acres #102) located west of drainage areas 1 and 2 above across Possum Point Road. It is within this drainage area that the old Ash Ponds A, B, and C were located.

Potential

Contaminants: None

- 1996 -** VPDES permit reissued with and effective date of August 9, 1996. Permit does not contain specific reference to ponds A, B, C, but does include requirement for development of SWPPP.
- 2001 -** Reissued VPDES Permit reissued effective date September 13. Previous permit had required development of a storm water pollution prevention plan. This permit also contained a condition (G. Storm Water Management) requiring that the SWPPP be updated.
- 2004 -** VPDES permit modified to incorporate wastewater discharges associated with the new Unit 6.
- 2006 –** Application for renewal of Possum Point’s discharge permit submitted March 2006. The application includes a description of Outfall S104 and associated drainage area that is essentially identical to the one from 1996 SWPPP above.
- 2007 -** VPDES permit reissued effective October 24, 2007. There is no specific reference to Outfall 104 in the permit; however, Table 3 of the Fact Sheet developed by DEQ to support the permit contains a list of stormwater outfalls and drainage area descriptions that include S104.
- 2008 –** Possum Point’s Stormwater Pollution Prevention Plan (SWPP) was updated and Outfall S104 no longer specifically recognized in the plan. The drainage areas contributing to S104 are shown as sheet flow. **NOTE: This was likely done given the status of ponds A, B, and C at that time and previous determinations concerning the lack of potential for pollutants to be present in the discharge.**
- 2012 -** Application for reissuance of Possum Point’s VPDES permit submitted April 5. Form 2F lists 15 stormwater discharges from Possum Point. S104 is not included on the list. The application includes the Stormwater Pollution Prevention Plan (SWPPP), which had been updated in 2011 and continued to show the drainage area associated with ponds A, B, & C as sheet flow. The list of Outfalls in the SWPPP is identical to the list in Form 2F and does not include S104.
- 2013 -** Possum Point’s VPDES permit is reissued and does not specifically recognize the discharge from Pond C.